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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

HUMBOLDT BAYKEEPER, a program of
Ecological Rights Foundation, and
ECOLOGICAL RIGHTS FOUNDATION, a
non-profit corporation,
Plaintiffs,

v.

UNION PACIFIC RAILROAD COMPANY, a
Delaware corporation, NORTH COAST
RAILROAD AUTHORITY, a state agency, and
CUE VI, LLC, an Alaska limited liability
company,
Defendants.

No. 06-02560 JSW

**STIPULATION TO EXTEND
DEADLINE TO COMPLETE
DEPOSITIONS;
~~PROPOSED~~ ORDER**

Trial Date: August 30, 2010
Courtroom 11, 19th Floor
Honorable Jeffrey S. White

On February 17, 2010, the Court reopened discovery for sixty days to enable Plaintiffs to depose specified witnesses. *See* ECF Dkt. No. 383 at 2. Defendants' counsel is unable to attend the deposition of Caryn Woodhouse scheduled for April 15. However, both the parties and Ms. Woodhouse are available to conduct the deposition on April 22, 2010.

IT IS THEREFORE STIPULATED AND AGREED THAT, the sixty-day deadline is extended to allow the deposition of Caryn Woodhouse on April 22, 2010.

Dated: March 25, 2010

BRISCOE IVESTER & BAZEL LLP

By: 

Lawrence S. Bazel
Attorneys for Defendants
CUE VI, LLC and UNION PACIFIC
RAILROAD COMPANY

Dated: March 25, 2010

LAWYERS FOR CLEAN WATER, INC.

By: _____/s/_____

Layne Friedrich
Attorneys for Plaintiffs
HUMBOLDT BAYKEEPER and
ECOLOGICAL RIGHTS FOUNDATION

Dated: March 25, 2010

LAW OFFICES OF CHRISTOPHER J. NEARY

By: _____/s/_____

Christopher J. Neary
Attorney for Defendant NORTH COAST
RAILROAD AUTHORITY

ATTESTATION

I, Lawrence S. Bazel, am counsel for CUE VI, LLC and Union Pacific Railroad Company and the registered ECF user whose username and password are being used to file this Stipulation To Extend Deadline To Complete Depositions and [Proposed] Order. In compliance with General Order 45 X.B, I hereby attest that the above-identified counsel for Plaintiffs and NCRA concurred in this filing.

Dated: March 25, 2010

Respectfully submitted,

By: /s/ Lawrence S. Bazel_

[PROPOSED] ORDER

After consideration of the Parties' Stipulation to Extend the Time to Complete Depositions, and for good cause appearing:

PURSUANT TO STIPULATION, IT IS SO ORDERED that the Court will allow the deposition of Ms. Caryn Woodhouse be conducted on April 22, 2010

IT IS SO ORDERED.

Dated: March 29, 2010



JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE